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IN THE

Supreme Court of the United States

OCTOBER TERM, 1977

No. 77-240

ST. PAUL FIRE & MARINE INSURANCE COMPANY, *et al.*, *Petitioners,*

v.

DAVID M. BARRY, *et al.*, *Respondents.*

On Petition for a Writ of Certiorari to the United States Court of Appeals for the First Circuit

AMICI CURIAE BRIEF OF THE AMERICAN INSURANCE ASSOCIATION, THE ALLIANCE OF AMERICAN INSURERS AND THE NATIONAL ASSOCIATION OF INDEPENDENT INSURERS IN SUPPORT OF THE PETITION FOR A WRIT OF CERTIORARI

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The American Insurance Association, the Alliance of American Insurers and the National Association of Independent Insurers, with the consent of all parties, file this brief as *amici curiae* in support of a writ of certiorari to review the judgment of the United States Court of Appeals for the First Circuit.

THE INTEREST OF THE AMICI CURIAE

The American Insurance Association ("AIA") is a voluntary trade association of approximately 145 stock insurance companies (a list of which is appended hereto as Appendix A). The Alliance of American Insurers ("Alliance") is a voluntary trade association of approximately 100 mutual insurance companies (a list of which is appended hereto as Appendix B). The National Association of Independent Insurers ("NAII") is a voluntary trade association of over 400 insurance companies (a list of which is appended hereto as Appendix C). Together, these companies write a significant portion of the property and casualty insurance policies issued in the United States. A number of the member companies of these associations write medical malpractice insurance, the subject of this suit. These companies are directly affected by the First Circuit's judgment, which renders them potentially liable for treble damages in policyholder suits brought under the federal antitrust laws.

The First Circuit's ruling, moreover, would remove the antitrust exemption from policyholders' actions attacking any form of coverage and any type of policy, including all of those written by the members of AIA, NAII and the Alliance. By exposing them to antitrust liability notwithstanding the contrary decisions of other Courts of Appeals, an express Congressional grant of antitrust immunity and intensive state regulation of insurance, the decision of the First Circuit subjects all AIA, NAII and Alliance members to serious uncertainties about the conditions under which coverages and policies can or must be made available.

QUESTION PRESENTED

The McCarran-Ferguson Act, §§ 1, 2, 3(b), 59 Stat. 34 (1945), 15 U.S.C. §§ 1011, 1012, 1013(b) (1970) (hereinafter "McCarran Act"), provides in pertinent part that the federal antitrust laws are not applicable to the "business of insurance" when regulated by state law—except, as provided in § 3(b) of that Act, in cases of "boycott, coercion and intimidation." The question which these *amici* believe is presented is:

> Whether the McCarran Act's "boycott exception" extends to an alleged boycott of policyholders by companies admittedly engaged in the business of insurance and regulated by state law.

REASONS FOR GRANTING THE WRIT

I. The Decision Below Is In Direct Conflict With Those of the Fifth and Ninth Circuit Courts of Appeals Which Have Construed the Boycott Exception to Preclude Policyholder Suits

The plaintiffs, medical doctors and other individuals purporting to represent a class of Rhode Island physicians and a class of their present or prospective patients, respectively, filed this action in the district court alleging, *inter alia*, that the plaintiff physicians had been "boycotted" by the defendants, insurance companies providing medical malpractice insurance in the State of Rhode Island. According to the complaint, the plaintiff doctors had previously purchased malpractice insurance from one of the defendants, which insurance provided coverage on an "occurrence" basis, *i.e.*, the policy covered the period during which the alleged malpractice occurred. Complaint, Count I, ¶¶ 19, 24 (Appendix C to the Petition, at A-44a-46a). Thus, if a doctor had in force a policy providing coverage

during 1970 and committed an act constituting malpractice during that year, the policy would still provide coverage even if the doctor discontinued his insurance in 1971 and a claim was made in 1971 or thereafter. The complaint alleged that upon expiration of those policies, the only type of coverage the doctors were able to obtain was from the same insurer and then only on a "claims made" basis, *i.e.*, the policy covered the period during which a claim was made, so that coverage would be provided even though the act constituting malpractice occurred at a time prior to the date when the coverage became effective. Coverage, however, would not be provided if the act occurred during the policy year but the claim was made in a subsequent year. Complaint, Count I, ¶¶ 27, 28 and 30 (Appendix C to the Petition, at A-46a-47a).

The Court below held that these allegations were sufficient to trigger the McCarran Act's boycott exception and therefore remove the antitrust immunity otherwise conferred by the Act. In reviewing the prior decisions of other circuits and the district courts construing the exception, the First Circuit's majority admits that it was "compelled to disagree with this rather formidable array of authorities," including the contrary decisions of the Fifth and Ninth Circuits. (Appendix A to the Petition ("App. A"), at 6a.) Indeed, the novelty of the majority's ruling is underscored by the fact that it could cite *no* previous decision which construed the boycott exception to permit policyholder suits against insurance companies under the federal antitrust laws.

Unlike the First Circuit, which made the boycott exception available to all antitrust plaintiffs, the Fifth and Ninth Circuits have interpreted it to include only boycotts aimed at those engaged in the "business of

insurance," that is, insurance companies and their agents. In *Addrisi* v. *Equitable Life Assurance Society of the U.S.*, 503 F.2d 725 (9th Cir. 1974), *cert. denied*, 420 U.S. 929 (1975), the Ninth Circuit affirmed the district court's dismissal of the complaint for failure to state a claim against the plaintiff's contention that the required purchase of a "credit" insurance policy in conjunction with receiving a loan was an act of "boycott" or "coercion" depriving the alleged "tie-in" of an antitrust exemption. The court rejected this argument, explaining that:

> . . . it is evident from an examination of the legislative history behind § 1013(b) that the intent of Congress was to reserve unto the reach of the Sherman Act only a narrow area of restraint of trade activity among those in the business of insurance, namely, antitrust acts among insurance companies and agents for the purpose of boycott or coercion *among insurance companies and agents.* [503 F.2d at 728-729 (emphasis added).]

The Fifth Circuit, in *Meicler* v. *Aetna Casualty and Surety Co.*, 506 F.2d 732 (5th Cir. 1975), came to the same conclusion in determining that the "boycott exception" was not applicable to the sale of automobile insurance at state-regulated rates set in accordance with a driver risk classification plan.

Barring antitrust actions by insureds against insurers has been deemed necessary to effectuate the primary purpose of the McCarran Act—federal deference to state regulation of insurance. The Ninth Circuit concluded in *Addrisi* that permitting policyholder antitrust actions would:

> . . . vitiate the McCarran-Ferguson Act in its concept of setting over unto the several states the regu-

lation and protection of the insurer-insured relationship. [503 F.2d at 729 (citations omitted).]

In the *Meicler* decision, the Fifth Circuit similarly emphasized that such a "broad construction of Section 1013(b) would emasculate the antitrust exemption contained in Section 1012(b) of the McCarran-Ferguson Act." 506 F.2d at 734.

II. The Decision Below Directly Conflicts With the States' Power—As Congressionally Mandated by the McCarran Act—To Regulate the Business of Insurance

The State of Rhode Island—as do virtually all of the states—exercises pervasive regulatory control over the business of insurance, including medical malpractice insurance. In particular, both the availability of malpractice insurance and the type of coverage afforded by the policies in question is regulated by the State. (App. A, at 4a. *See also* App. A, at 22a (dissenting opinion of Campbell, J.).) The complaint, moreover, acknowledges that Rhode Island's Commissioner of Insurance establishes premium rates for malpractice insurance, based upon the type and scope of coverage. Complaint, Count II, ¶¶ 7-9 (Appendix C to the Petition, at 55a). Malpractice insurance rates, like other insurance rates, are derived from an elaborate state-by-state statistical analysis of loss experience and projected losses for the particular risk or risks insured against. Indeed, in the business of insurance and in its regulation by the states, questions of coverages, rates and availability are functionally inseparable since all evolve from an analysis and classification of risks.[1]

[1] Because of this interdependency, the Court of Appeals' holding on the "boycott exception" cannot be reconciled with its approval of the district court's abstaining from a consideration of plaintiffs' state-law claim for restitution of all amounts paid in excess of a "fair and reasonable" malpractice insurance rate—in order to avoid the "risk [of] interfering with the states' regulatory scheme or misinterpreting state law." (App. A, at 19a.)

As this Court stressed in *SEC* v. *National Securities, Inc.*, 393 U.S. 453, 460 (1969), the purpose of the McCarran Act is to suspend application of the federal antitrust laws in favor of "the type of state regulation that centers around the contract of insurance," precisely the form of regulation adopted by Rhode Island to deal with medical malpractice insurance rates, availability and coverage. The "core of the 'business of insurance'" which, the Court said, is to be left to state regulation is

> . . . The relationship between insurer and insured, the type of policy which could be issued, its reliability, interpretation, and enforcement . . . [393 U.S. at 460.]

Despite this, the court below held that the plaintiff doctors are not barred by the boycott exception from seeking to recover treble damages for an alleged "boycott" by the insurance company defendants solely because of a claimed refusal to provide the insurance or type of coverage which plaintiffs desired—notwithstanding state regulation. If such a departure from precedent is to take place, it should only be after plenary consideration by this Court.

If, as is the case here, the state has exercised its regulatory authority, it is difficult to envision a more direct impairment of the ability of the state effectively to regulate the business of insurance and "the relationship between the insurance company and the policyholder" than having insurers subjected to contradic-

tory "regulation" through the processes of *ad hoc* antitrust litigation at the instance of disgruntled policyholders.

Instead of state regulation through such administrative procedures as approval of rates and policy provisions and investigation of complaints of unfair practices,[2] the already overburdened federal courts will be placed in the position of passing upon the efficacy and propriety of the minutiae of state insurance regulation. This is a task for which judges and juries are ill-suited and flies in the face of the congressional declaration that "the continued regulation . . . by the several States . . . is in the public interest." McCarran Act § 1, 15 U.S.C. § 1011.

If plaintiff physicians can successfully call into question state-regulated insurance practices by the simple expedient of alleging a "boycott," then any other policyholder or even a prospective policyholder may assert that he, too, has been "boycotted" by not being able to obtain the insurance—including specific terms and conditions of coverage—that he desires. Thus, it is not difficult to envision a high-risk driver complaining in federal court that he, too, has been "boycotted" by being placed in an assigned high-risk pool or by being required to pay a higher premium, *cf., e.g., Meicler* v. *Aetna Casualty and Surety Co.*, 373 F. Supp. 509 (S.D. Tex. 1974), *affirmed*, 506 F.2d 732 (5th

[2] Rhode Island's insurance statutes specifically recite that they were enacted "in accordance with the intent of Congress as expressed in" the McCarran Act, R.I. Gen. Laws § 27-29-1, and further provide for public hearings, appropriate orders and judicial review and enforcement of such orders upon any claim of a violation of the State's insurance laws, including claims by policyholders or those who allege they were denied coverage. R.I. Gen. Laws §§ 27-29-5 through 27-29-9.

Cir. 1975); or a sky-diver alleging that he has been "boycotted" or "coerced" because he is unable to obtain life or accident insurance or is only able to do so by paying a higher premium; or a consumer alleging that he has been "boycotted" because health or medical insurers will not provide him with dental services as part of a general health-care plan or have only provided certain pregnancy benefits to his wife—despite state regulation of each of these matters.[3]

If the delicate balance of state regulation of the business of insurance [4] is to be subjected to the scrutiny of the antitrust laws generally, it should only be after statutory revision by Congress, which has previously determined that it is in the public interest to leave such regulation to the states, or upon appropriate consideration and a decision by this Court.

[3] At least two federal courts have explicitly rejected the type of claims made by respondents in this case. In Pastor v. Hartford Fire Ins. Co., 1976-1 CCH Trade Cas. ¶ 60,783 (C.D. Cal. 1976) (appeal pending, 9th Cir.), the court held that allegations of coercion, intimidation and boycott on the part of physicians concerning medical malpractice insurance failed to state a claim upon which relief can be granted since the alleged "boycott" was not within the proper ambit of the McCarran Act's boycott exception. And in Pierucci v. Continental Casualty Co., 1976-2 CCH Trade Cas. ¶ 61,110 (W.D. Pa. 1976), the court held that allegations of a "boycott" by insurance companies which would only provide architect's liability insurance on a "claims made" basis should properly be made to the state Insurance Commissioner.

[4] The State of Rhode Island had already enacted regulations establishing a joint underwriting association to provide medical malpractice insurance and requiring all insurers authorized to write personal liability coverages in the state to participate in the association. (App. A, at A-3, n. 2; Appendix B to Petition, at 30, n. 2). The nationwide efforts to come to grips with this issue by the appropriate state agencies are matters of public record.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

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APPENDIX

APPENDIX A

AMERICAN INSURANCE ASSOCIATION
MEMBER COMPANIES

Admiral Insurance Company
Hartford, Connecticut

AEtna Casualty and Surety Company, The
Hartford, Connecticut

AEtna Casualty and Surety Company of Illinois, The
Chicago, Illinois

Aetna Fire Underwriters Insurance Company
Hartford, Connecticut

Aetna Insurance Company
Hartford, Connecticut

Aetna Insurance Company of the Midwest
Indianapolis, Indiana

Alaska Insurance Co., The
Anchorage, Alaska

Alaska Pacific Assurance Company
Anchorage, Alaska

Albany Insurance Company
New York, New York

Alliance Assurance Company, Ltd.
New York, New York

Allied Insurance Company
Los Angeles, California

American Automobile Insurance Company
Newark, New Jersey

American Employers' Insurance Company
Boston, Massachusetts

American Fidelity Company
Manchester, New Hampshire

American Foreign Insurance Company
New York, New York

American General Fire & Casualty
Houston, Texas

American General Insurance Company
Houston, Texas

American Insurance Company, The
Newark, New Jersey

Associated Indemnity Corporation
San Francisco, California

Assurance Company of America
New York, New York

Atlas Assurance Company, Ltd.
New York, New York

Automobile Insurance Company of Hartford, Connecticut, The
Hartford, Connecticut

Bituminous Casualty Corporation
Rock Island, Illinois

Bituminous Fire and Marine Insurance Company
Rock Island, Illinois

Blue Ridge Insurance Company
Baltimore, Maryland

British America Assurance Company, The
Toronto, Ontario

Camden Fire Insurance Association, The
Philadelphia, Pennsylvania

Century Indemnity Company
Hartford, Connecticut

Charter Oak Fire Insurance Company
Hartford, Connecticut

City Insurance Company
New York, New York

Colonial Penn Franklin Insurance Company
Philadelphia, Pennsylvania

Colonial Penn Insurance Company
Philadelphia, Pennsylvania

Commercial Union Insurance Company
Boston, Massachusetts

Connecticut Indemnity Company, The
Hartford, Connecticut

Eagle Star Insurance Company Limited
New York, New York

Employers' Fire Insurance Company, The
Boston, Massachusetts

Employers' Surplus Lines Insurance Company
Boston, Massachusetts

Equitable General Insurance Company
Fort Worth, Texas

Excelsior Insurance Company of New York
Syracuse, New York

Farmers Fire Insurance Company, The
York, Pennsylvania

Federal Insurance Company
New York, New York

Fidelity & Deposit Company of Maryland
Baltimore, Maryland

Fidelity and Guaranty Insurance Underwriters, Inc.
Baltimore, Maryland

Fire and Casualty Insurance Company of Connecticut, The
Hartford, Connecticut

Fireman's Fund Insurance Company
San Francisco, California

Fireman's Fund Insurance Company of Texas
San Francisco, California

First State Insurance Company
Boston, Massachusetts

General Accident Fire and Life Assurance Corporation, Ltd.
Philadelphia, Pennsylvania

Globe Indemnity Company
New York, New York

Granite State Insurance Company
Manchester, New Hampshire

Great Northern Insurance Company
Minneapolis, Minnesota

Gulf American Fire and Casualty Company
Montgomery, Alabama

Hartford Accident and Indemnity Company
Hartford, Connecticut

Hartford Casualty Insurance Company
Hartford, Connecticut

Hartford Fire Insurance Company
Hartford, Connecticut

Hartford Steam Boiler Inspection and Insurance Company, The
Hartford, Connecticut

HOME Indemnity Company, The
New York, New York

HOME Insurance Company, The
Manchester, New Hampshire

HOME Insurance Company of Illinois, The
Chicago, Illinois

HOME Insurance Company of Indiana, The
Indianapolis, Indiana

Home Owners Insurance Company
Hato Rey, Puerto Rico

Houston General Insurance Company
Fort Worth, Texas

Houston General Lloyds
Fort Worth, Texas

Illinois Insurance Company
Chicago, Illinois

Illinois National Insurance Company
Springfield, Illinois

Industrial Indemnity Company
San Francisco, California

Industrial Insurance Company
San Francisco, California

Industrial Insurance Company of Hawaii, Ltd.
Honolulu, Hawaii

Industrial Underwriters Insurance Company
Dallas, Texas

Inland National Insurance Company
Springfield, Illinois

Insurors Indemnity and Insurance Company
Oklahoma City, Oklahoma

INA Insurance Company of Ohio
Lakewood, Ohio

INA of Texas
Los Angeles, California

Insurance Company of North America
Philadelphia, Pennsylvania

International Insurance Company
New York, New York

Jefferson-Pilot Fire and Casualty Company
Greensboro, North Carolina

London Assurance, The
New York, New York

Maine Bonding & Casualty Company
Portland, Maine

Maryland Casualty Company
Baltimore, Maryland

Metropolitan Fire Assurance Company
Hartford, Connecticut

Millers National Insurance Company
Chicago, Illinois

Monarch Insurance Company of Ohio, The
New York, New York

National Standard Insurance Company
Houston, Texas

National Surety Corporation
Chicago, Illinois

National Surety Corporation of California
San Francisco, California

Newark Insurance Company
New York, New York

New England Reinsurance Corporation
Boston, Massachusetts

New Hampshire Indemnity Company
Manchester, New Hampshire

New Hampshire Insurance Company
Manchester, New Hampshire

New York Underwriters Insurance Company
New York, New York

North River Insurance Company, The
New York, New York

Northern Assurance Company of America, The
Boston, Massachusetts

Northern Insurance Company of New York
Baltimore, Maryland

Northwestern Pacific Indemnity Company
Portland, Oregon

Pacific Employers Insurance Company
Los Angeles, California

Pacific Indemnity Company
Los Angeles, California

Pacific Insurance Company, Limited
Honolulu, Hawaii

Pennsylvania General Insurance Company
Philadelphia, Pennsylvania

Phoenix Insurance Company, The
Hartford, Connecticut

Planet Insurance Company
Philadelphia, Pennsylvania

Potomac Insurance Company
Philadelphia, Pennsylvania

Provident General Insurance Company
Chattanooga, Tennessee

Reliance Insurance Company
Philadelphia, Pennsylvania

Reliance Insurance Company of Illinois
Chicago, Illinois

Republic Insurance Company
Dallas, Texas

Republic Underwriters Insurance Company
Oklahoma City, Oklahoma

Republic-Vanguard Insurance Company
Oak Park, Illinois

Royal Globe Insurance Company
Chicago, Illinois

Royal Indemnity Company
New York, New York

Safeguard Insurance Company
New York, New York

St. Paul Fire and Marine Insurance Company
St. Paul, Minnesota

St. Paul Guardian Insurance Company
St. Paul, Minnesota

St. Paul Insurance Company of Illinois, The
Chicago, Illinois

St. Paul Insurance Company of Texas, The
Houston, Texas

St. Paul Mercury Insurance Company
St. Paul, Minnesota

Sea Insurance Company, Ltd., The
New York, New York

Seaboard Surety Company
New York, New York

Security Insurance Company of Hartford
Hartford, Connecticut

Select Way Insurance Company
Branchville, New Jersey

Selected Risks Insurance Company
Branchville, New Jersey

Sentinel Insurance Company, Limited
Honolulu, Hawaii

Southern Fire & Casualty Company
Knoxville, Tennessee

Standard Fire Insurance Company, The
Hartford, Connecticut

Sumitomo Marine & Fire Insurance Company, Ltd., The
New York, New York

Sun Insurance Office, Limited
New York, New York

Texas Pacific Indemnity Company
Dallas, Texas

Traders Indemnity Company
Fort Worth, Texas

Travelers Indemnity Company, The
Hartford, Connecticut

Travelers Indemnity Company of America, The
Hartford, Connecticut

Travelers Indemnity Company of Illinois, The
Chicago, Illinois

Travelers Indemnity Company of Rhode Island, The
Hartford, Connecticut

Travelers Insurance Company, The
Hartford, Connecticut

Twin City Fire Insurance Company
Hartford, Connecticut

United Pacific Insurance Company
Tacoma, Washington

United States Fidelity and Guaranty Company
Baltimore, Maryland

United States Fire Insurance Company
New York, New York

Vanguard Insurance Company
Dallas, Texas

Vanguard Underwriters Insurance Company
Oklahoma City, Oklahoma

Vigilant Insurance Company
New York, New York

Westchester Fire Insurance Company
New York, New York

Western Assurance Company, The
Toronto, Ontario

Western Casualty and Surety Company, The
Fort Scott, Kansas

Western Fire Insurance Company, The
Fort Scott, Kansas

Western Indemnity Company, Inc., The
Fort Scott, Kansas

APPENDIX B

THE ALLIANCE OF AMERICAN INSURERS
MEMBER COMPANIES

Abington Mutual Fire Insurance Company
Abington, Massachusetts

Amalgamated Casualty Insurance Company
Washington, D.C.

American Hardware Mutual Insurance Company
Minneapolis, Minnesota

American Manufacturers Mutual Insurance Company
Long Grove, Illinois

American Mutual Insurance Company of Boston
Wakefield, Massachusetts

American Mutual Liability Insurance Company
Wakefield, Massachusetts

American Mutual Reinsurance Company
Chicago, Illinois

Amica Mutual Insurance Company
Providence, Rhode Island

Atlantic Mutual Fire Insurance Company of Savannah
Savannah, Georgia

Attleboro Mutual Fire Insurance Company
Attleboro, Massachusetts

Austin Mutual Insurance Company
Minneapolis, Minnesota

Bakers Mutual Insurance Company of New York
Lynbrook, New York

Barnstable County Mutual Fire Insurance Company
Yarmouth Port, Massachusetts

Brethren Mutual Insurance Company
Hagerstown, Maryland

California Mutual Insurance Company
Monterey, California

Central Mutual Insurance Company
Van Wert, Ohio

Chicago Mutual Liability Company
Chicago, Illinois

Church Mutual Insurance Company
Merrill, Wisconsin

Cincinnati Equitable Insurance Company
Cincinnati, Ohio

Citizens Mutual Insurance Company
Janesville, Wisconsin

Citizens Security Mutual Insurance Company
Red Wing, Minnesota

Dorchester Mutual Fire Insurance Company
Boston, Massachusetts

Druggists Mutual Insurance Company
Algona, Iowa

Employers Mutual Casualty Company
Des Moines, Iowa

Employers Mutual Liability Insurance Company
Wausau, Wisconsin

Farmers Alliance Mutual Insurance Company
McPherson, Kansas

Federated Mutual Insurance Company
Owatonna, Minnesota

Fitchburg Mutual Fire Insurance Company
Fitchburg, Massachusetts

Florists' Mutual Insurance Company
Edwardsville, Illinois

Grain Dealers Mutual Insurance Company
Indianapolis, Indiana

Granite Mutual Insurance Company
Barre, Vermont

The Hamilton Mutual Insurance Company of Cincinnati, Ohio
Cincinnati, Ohio

Hingham Mutual Fire Insurance Company
Hingham, Massachusetts

Holyoke Mutual Insurance Company in Salem
Salem, Massachusetts

Ideal Mutual Insurance Company
New York, New York

IMT Insurance Company (Mutual)
Des Moines, Iowa

Indiana Farmers Mutual Insurance Company
Indianapolis, Indiana

Indiana Lumbermens Mutual Insurance Company
Indianapolis, Indiana

Indiana Union Mutual Insurance Company
Carmel, Indiana

Interboro Mutual Indemnity Insurance Company
Mineola, New York

Iowa Kemper Insurance Company
Mason City, Iowa

Iowa National Mutual Insurance Company
Cedar Rapids, Iowa

Jewelers Mutual Insurance Company
Neenah, Wisconsin

Liberty Mutual Fire Insurance Company
Boston, Massachusetts

Liberty Mutual Insurance Company
Boston, Massachusetts

Lumber Mutual Insurance Company
Wellesley, Massachusetts

Lumbermens Mutual Casualty Company
Long Grove, Illinois

The Lumbermens Mutual Insurance Company
Mansfield, Ohio

Lutheran Mutual Fire Insurance Company
Oak Park, Illinois

Merchants and Business Men's Mutual Insurance Company
Harrisburg, Pennsylvania

Merrimack Mutual Fire Insurance Company
Andover, Massachusetts

Metropolitan Property and Liability Insurance Company
Warwick, Rhode Island

Michigan Millers Mutual Insurance Company
Lansing, Michigan

Michigan Mutual Insurance Company
Detroit, Michigan

Middlesex Insurance Company
Concord, Massachusetts

Middlesex Mutual Assurance Company
Middletown, Connecticut

Millers Mutual Insurance Association of Illinois
Alton, Illinois

Minnesota Mutual Fire and Casualty Company
Minneapolis, Minnesota

Montgomery Mutual Insurance Company
Sandy Spring, Maryland

Mountain States Mutual Casualty Company
Albuquerque, New Mexico

Municipal Mutual Insurance Company of West Virginia
Wellsburg, West Virginia

Mutual Assurance Company for Insuring Houses from Loss by Fire
Philadelphia, Pennsylvania

National Grange Mutual Insurance Company
Keene, New Hampshire

New Castle Mutual Insurance Company
Wilmington, Delaware

New Jersey Manufacturers Insurance Company
Trenton, New Jersey

Norfolk and Dedham Mutual Fire Insurance Company
Dedham, Massachusetts

Pennsylvania Lumbermens Mutual Insurance Company
Philadelphia, Pennsylvania

Pennsylvania Millers Mutual Insurance Company
Wilkes-Barre, Pennsylvania

Patrons Mutual Insurance Association
Alathe, Kansas

The Philadelphia Contributionship for the Insurance of Houses from Loss by Fire
Philadelphia, Pennsylvania

Preferred Mutual Insurance Company
New Berlin, New York

Prudential Property and Casualty Insurance Company
Holmdel, New Jersey

Retail Lumbermens Mutual Insurance Company of Wisconsin
Milwaukee, Wisconsin

Safety Mutual Casualty Corporation
St. Louis, Missouri

Security Mutual Casualty Company
Chicago, Illinois

Sentry Insurance and Mutual Company
Stevens Point, Wisconsin

The Shelby Mutual Insurance Company of Shelby, Ohio
Shelby, Ohio

Texas Employers' Insurance Association
Dallas, Texas

Town and Country Mutual Insurance Company
Indianapolis, Indiana

Tri-State Insurance Company of Minnesota
Luverne, Minnesota

Union Mutual Insurance Company of Providence
Warwick, Rhode Island

Utica Fire Insurance Company of Oneida County, New York
Utica, New York

Utica Mutual Insurance Company
Utica, New York

Utilities Mutual Insurance Company
New York, New York

Waseca Mutual Insurance Company
Waseca, Minnesota

Western National Mutual Insurance Company
Minneapolis, Minnesota

Wisconsin Mutual Insurance Company
Madison, Wisconsin

ASSOCIATE MEMBER COMPANIES

Farmers Mutual Fire Association of West Virginia
Fairmont, West Virginia

Industries Mutual Insurance Company
Omaha, Nebraska

The Ohio Hardware Mutual Insurance Company
Mansfield, Ohio

Pennsylvania National Mutual Casualty Insurance Company
Harrisburg, Pennsylvania

Wayne Mutual Insurance Company
Wooster, Ohio

Landmark American Insurance Company
Oklahoma City, Oklahoma

APPENDIX C

NATIONAL ASSOCIATION OF INDEPENDENT INSURERS
MEMBER COMPANIES

Agricultural Workers Mut. Auto. Ins. Co.
Fort Worth, Texas

Agsecurity Insurance Company
Oklahoma City, Oklahoma

Agway Insurance Company
Syracuse, New York

Aid Insurance Company (Mutual)
Des Moines, Iowa

Alabama Farm Bureau Mut. Ins. Co.
Montgomery, Alabama

Alabama Farm Bur. Mut. Ins. Service, Inc.
Montgomery, Alabama

Alabama Rural Fire Insurance Company
Montgomery, Alabama

Allied Fidelity Insurance Company
Indianapolis, Indiana

Allstate Fire Insurance Company
Northbrook, Illinois

Allstate Indemnity Company
Northbrook, Illinois

Allstate Insurance Company
Northbrook, Illinois

American Agricultural Ins. Co.
Park Ridge, Illinois

American Bankers Ins. Co. of Florida
Miami, Florida

American Bonding Company
Los Angeles, California

American Centennial Ins. Co.
Morristown, New Jersey

American Colonial Insurance Company
Little Rock, Arkansas

American Consumer Insurance Company
Woodbury, New York

American Family Mutual Insurance Company
Madison, Wisconsin

American Fidelity Fire Ins. Co.
Woodbury, N.Y.

American Fidelity Insurance Company
Oklahoma City, Oklahoma

American Guarantee & Liability Ins. Co.
Chicago, Illinois

American Homeowners Ins. Co. of D.C.
Washington, D.C.

American Liberty Insurance Company
Birmingham, Alabama

American Modern Home Insurance Company
Cincinnati, Ohio

American Mutual Reinsurance Company
Chicago, Illinois

American National Property & Casualty Co.
Springfield, Missouri

American Re-Insurance Company
New York, N.Y.

American Service Mutual Insurance Co.
Montgomery, Alabama

American Southern Insurance Company
Atlanta, Georgia

American Universal Insurance Company
Providence, Rhode Island

Archdale Mutual Insurance Co.
Charlotte, North Carolina

Arkwright-Boston Insurance Company
Waltham, Massachusetts

Atlanta Casualty Company
Atlanta, Georgia

Audubon Insurance Company
Baton Rouge, Louisiana

Auto-Owners Insurance Company
Lansing, Michigan

Automobile Club Insurance Company
Columbus, Ohio

Automobile Club Inter-Insurance Exchange
Maryland Heights, Missouri

Avemco Insurance Company
Bethesda, Maryland

BLC Insurance Company
Des Moines, Iowa

Badger Mutual Insurance Company
Milwaukee, Wisconsin

Badger State Mutual Casualty Company
Milwaukee, Wisconsin

Balboa Insurance Company
Newport Beach, Ca.

Bankers Multiple Line Insurance Co.
Chicago, Illinois

Bankers Mutual Insurance Co. of D.C.
Silver Spring, Maryland

Belk Stores Insurance Reciprocal
Charlotte, North Carolina

Bellefonte Insurance Company
Middletown, Ohio

Brotherhood Mutual Insurance Company
Fort Wayne, Indiana

B S P Insurance Company
Scottsdale, Arizona

Buffalo Reinsurance Company
Los Angeles, California

Cal-Farm Insurance Company
Berkeley, California

California Casualty Indemnity Exchange
San Mateo, California

California Casualty Insurance Company
San Mateo, California

Cameron Mutual Insurance Company
Cameron, Missouri

Canadian Universal Ins. Co., Ltd.
Providence, Rhode Island

Carolina Casualty Insurance Company
Jacksonville, Florida

Carriers Insurance Company
Des Moines, Iowa

Casualty Indemnity Exchange
Jefferson City, Missouri

Casualty Insurance Company
Chicago, Illinois

Catholic Relief Ins. Co of America
Omaha, Nebraska

Center Mutual Insurance Company
Rugby, North Dakota

Central Lloyds
Amarillo, Texas

Central National Insurance Co. of Omaha
Omaha, Nebraska

Champion Insurance Company
Birmingham, Ala.

Chicago Insurance Company
Chicago, Illinois

Chicago Mutual Liability Company
Chicago, Illinois

Chrysler Insurance Company
Troy, Michigan

Civil Service Employees Insurance Co.
San Francisco, California

Classified Insurance Corporation
Milwaukee, Wisconsin

College/University Ins. Co. of America
Indianapolis, Indiana

Colonial Assurance Company
Wayne, Pennsylvania

Colonial Insurance Co. of California
Newport Beach, CA

Colorado Farm Bureau Mutual Ins. Co.
Denver, Colorado

Comco Insurance Company
Amarillo, Texas

Commercial Standard Insurance Company
Fort Worth, Texas

Commodore Insurance Co.
Houston, Texas

Commonwealth Fire and Casualty Ins. Co.
Louisville, Kentucky

Concord General Mutual Insurance Co.
Concord, New Hampshire

Cornhusker Casualty Company
Omaha, Nebraska

Continental Western Insurance Company
Des Moines, Iowa

Cotton Belt Insurance Company, Inc.
Memphis, Tennessee

Cotton States Mutual Insurance Company
Atlanta, Georgia

Country Casualty Insurance Company
Bloomington, Illinois

Country Mutual Insurance Company
Bloomington, Illinois

Countryside Casualty Company
Columbia, Missouri

Countrywide Insurance Company
Los Angeles, California

Covington Mutual Insurance Company
Indianapolis, Indiana

Credit General Insurance Company
Springfield, Ohio

Criterion Insurance Company
Washington, D.C.

Cumis Insurance Society, Inc.
Madison, Wisconsin

Dairyland Insurance Company
Scottsdale, Arizona

John Deere Insurance Company
Moline, Illinois

Delta Lloyds Insurance Co.
Houston, Texas

Dependable Insurance Company, Inc.
Jacksonville, Florida

Detroit Auto Inter-Insurance Exchange
Dearborn, Michigan

Diversified Insurers Company
Des Moines, Iowa

Dixie Auto. Insurance Company, Inc.
Birmingham, Alabama

Donegal Mutual Insurance Company
Marietta, Pennsylvania

Drake Insurance Company of New York
New York, New York

Early American Insurance Company
Fort Worth, Texas

Early Settlers Insurance Company
Richmond, Virginia

Economical Mutual Insurance Company
Kitchener, Ontario, Canada

Elkhorn Insurance Co.
New York, New York

Emmco Insurance Company
South Bend, Indiana

Empire Fire and Marine Insurance Company
Omaha, Nebraska

Empire Indemnity Insurance Company
Omaha, Nebraska

Empire Insurance Company
Santa Ana, California

Employers Reinsurance Corporation
Kansas City, Missouri

Erie Insurance Company
Erie, Pennsylvania

Erie Insurance Exchange
Erie, Pennsylvania

Excalibur Insurance Co.—Minnesota
Carrollton, Texas

Excalibur Insurance Company—Texas
Carrollton, Texas

Family Insurance Corporation
Shawand, Wisconsin

Farm Bureau Mutual Ins. Co. of Ark., Inc
Little Rock, Arkansas

Farm Bureau Mutual Ins. Co. of Idaho
Pocatello, Idaho

Farm Bureau Mutual Insurance Co. of Iowa
West Des Moines, Iowa

Farm Bureau Mutual Ins. Co., Inc. (Kan.)
Manhattan, Kansas

Farm Bureau Mutual Insurance Co. of Mo.
Jefferson City, Missouri

Farm Bureau Insurance Co. of Nebraska
Lincoln, Nebraska

Farm Bureau Town & County Ins. Co. of Mo.
Jefferson City, Missouri

Farmers and Merchants Insurance Company
Tulsa, Oklahoma

Farmers Automobile Ins. Association
Pekin, Illinois

Farmers Mutual Hail Ins. Co. of Iowa
Des Moines, Iowa

Farmers Mutual Ins. Co. of Nebraska
Lincoln, Nebraska

Farmers Reliance Insurance Co. of N.J.
Trenton, New Jersey

Farmland Mutual Insurance Co.
Des Moines, Iowa

The FB Insurance Company
Louisville, Kentucky

Federal Kemper Insurance Company
Decatur, Illinois

Federated Guaranty Mutual Insurance Co.
Montgomery, Alabama

Federated Rural Electric Ins. Corp.
Madison, Wisconsin

Fidelity Southern Insurance Company
Augusta, Georgia

Financial Indemnity Company
Los Angeles, California

First American Insurance Company
Kansas City, Missouri

First Fidelity Insurance Corporation
Oklahoma City, Oklahoma

First of Georgia Insurance Company
Augusta, Georgia

First of Georgia Underwriters Company
Augusta, Georgia

Florida Farm Bureau Cas. Ins. Co.
Gainesville, Florida

Florida Farm Bureau Mutual Ins. Co.
Gainesville, Florida

Foremost Insurance Company
Grand Rapids, Michigan

Forum Insurance Company
Chicago, Illinois

Foundation Reserve Ins. Co., Inc.
Las Vegas, New Mexico

Frankford Union Mutual Ins. Co.
Philadelphia, PA

Gamut Indemnity Company
Kansas City, Missouri

Garden State Fire & Casualty Co.
Newark, New Jersey

General Casualty Company of Illinois
Madison, Wisconsin

General Casualty Co. of Wisconsin
Madison, Wisconsin

General Reinsurance Corporation
Greenwich, Connecticut

Georgia Farm Bureau Mutual Ins. Co.
Macon, Georgia

Gerling Global Reinsurance Corporation
New York, New York

Glacier General Assurance Co.
Missoula, Montana

Globe American Casualty Company
Cleveland, Ohio

Government Employees Insurance Company
Washington, D.C.

Grange Insurance Association
Seattle, Washington

Grange Mutual Casualty Company
Columbus, Ohio

Great American of Dallas Fire & Cas. Co.
Westerville, Ohio

Great Southwest Fire Insurance Company
Scottsdale, Arizona

Great West Casualty Company
South Sioux City, Nebraska

Green Mountain Insurance Co., Inc.
Concord, N.H.

Grinnell Mutual Reinsurance Company
Grinnell, Iowa

Group Insurance Co. of Michigan
Dearborn, Michigan

Guarantee Insurance Company
Richardson, Texas

Guaranty National Insurance Company
Denver, Colorado

Hamilton Insurance Company
Washington, D. C.

Harbor Insurance Company
Los Angeles, California

Hargo National Insurance Company
Milwaukee, Wisconsin

Harleysville Mutual Insurance Company
Harleysville, Pennsylvania

Hawkeye Mutual Hail Ins. Co.
Fort Dodge, Iowa

Herald Fire Insurance Company
Jacksonville, Florida

Heritage Mutual Insurance Company
Sheboygan, Wisconsin

Home Mutual Insurance Company
Appleton, Wisconsin

Ideal Mutual Insurance Company
New York, New York

Illinois Founders Insurance Company
Chicago, Illinois

Implement Dealers Mutual Insurance Co.
Grand Forks, North Dakota

IMT Insurance Company
Des Moines, Iowa

Independent Indemnity Company
Santa Ana, California

Independent Fire Insurance Co.
Jacksonville, Florida

Industrial Fire & Casualty Company
Dallas, Texas

Inland Insurance Company
Lincoln, Nebraska

Inland Mutual Insurance Company
Huntington, West Virginia

The Insurance Company of Iowa
West Des Moines, Iowa

Insurance Company of Florida
Omaha, Nebraska

Integrity Mutual Insurance Company
Appleton, Wisconsin

Integon General Insurance Corporation
Winston-Salem, North Carolina

International Fidelity Insurance Co.
Newark, New Jersey

The International Insurance Co.
Takoma Park, Maryland

Interstate Fire and Casualty Company
Chicago, Illinois

Interstate Reinsurance Corporation
Chicago, Illinois

Iowa Mutual Insurance Company
Dewitt, Iowa

John Wesley Fire & Casualty Ins. Co.
Indianapolis, Indiana

Kentucky Casualty Insurance Company
Lexington, Kentucky

Kentucky Central Insurance Company
Lexington, Kentucky

Kentucky National Insurance Company
Lexington, Kentucky

Kentucky Farm Bureau Mutual Ins. Co.
Louisville, Kentucky

Kentucky Insurance Company
Louisville, Kentucky

Keystone Insurance Company
Philadelphia, Pennsylvania

KFB Insurance Company, Inc.
Manhattan, Kansas

Lakeland Fire & Casualty Co.
Omaha, Nebraska

League General Insurance Company
Detroit, Michigan

Le Mars Mutual Insurance Co. of Iowa
Dewitt, Iowa

Liberty National Fire Insurance Co.
Birmingham, Alabama

Lincoln Insurance Company
Princeton, New Jersey

Lincoln Mutual Casualty Company
Troy, Michigan

Lloyds of New Mexico Insurance Company
Las Vegas, New Mexico

Lloyds, New York
New York, New York

Louisiana Farm Bureau Mutual Ins. Co.
Baton Rouge, Louisiana

Lutheran Benevolent Insurance Exchange
Alma, Missouri

Madison County Mutual Auto. Ins. Co.
Edwardsville, Illinois

Members Insurance Company
Dallas, Texas

Members Mutual Insurance Company
Dallas, Texas

Members Service Insurance Company
Dallas, Texas

Merchants Mutual Bonding Company
Des Moines, Iowa

Meridan Mutual Insurance Company
Indianapolis, Indiana

Merit Insurance Company
Chicago, Illinois

Meritplan Insurance Company
Newport Beach, Ca.

M.F.A. Mutual Insurance Company
Columbia, Missouri

Michigan Educational Employees Mut. Ins.
Oak Park, Michigan

Michigan Mutual Auto Ins. Co.
Traverse City, Michigan

Mid-America Fire and Marine Ins. Co.
Kansas City, Missouri

Mid-Continent Casualty Company
Tulsa, Oklahoma

Mid-Continent Insurance Company
Somerset, Pennsylvania

Midland Casualty Insurance Company
New York, N.Y.

Midland Indemnity Insurance Company
New York, N.Y.

Midland Insurance Company
New York, New York

Midland Union Mutual Insurance Company
Juneau, Wisconsin

Midwest Mutual Insurance Company
West Des Moines, Iowa

Midwestern Indemnity Company
Milford, Ohio

Midwestern National Ins. Corp.
Milwaukee, Wisconsin

Millers Mutual Insurance Assoc. of Ill.
Alton, Illinois

Milwaukee Mutual Insurance Company
Milwaukee, Wisconsin

Minnehoma Insurance Company
Tulsa, Oklahoma

Mississippi Farm Bur. Mut. Ins. Co.
Jackson, Mississippi

Montgomery Ward Insurance Company
Chicago, Illinois

MONY Reinsurance Corp.
New York, N.Y.

Morrison Assurance Co., Inc.
Mobile, Alabama

Mortgage Guaranty Insurance Corp.
Milwaukee, Wisconsin

Motor Club of America Insurance Company
Newark, New Jersey

Motor Club Insurance Association
Omaha, Nebraska

Motor Club of Iowa Insurance Company
Davenport, Iowa

Motor Land Insurance Company
Dearborn, Michigan

Motor Vehicle Casualty Company
Providence, R.I.

Mt. Vernon Fire Insurance Co.
King of Prussia, Pa.

Mountain West Farm Bureau Mutual Ins. Co
Laramie, Wyoming

Munich American Reinsurance Company
New York, New York

Mutual Benefit Insurance Company
Huntingdon, Pennsylvania

National American Ins. Co. of New York
Allentown, Pennsylvania

Nassau Insurance Company
Jamaica, New York

National Farmers Union Prop. & Cas. Co.
Denver, Colorado

National Farmers Union Standard Ins. Co.
Denver, Colorado

National Fire & Marine Insurance Company
Omaha, Nebraska

National General Insurance Company—Miss.
Jackson, Mississippi

National General Insurance Co.—Mo.
St. Louis, Missouri

National Indemnity Company
Omaha, Nebraska

National Insurance Underwriters
St. Louis, Missouri

National Investors Fire & Cas. Ins. Co.
Little Rock, Arkansas

National Property Owners Ins. Co.
Nashville, Tennessee

National Reinsurance Corporation
New York, New York

National Trust Fire Insurance Company
Memphis, Tennessee

Nationwide General Insurance Company
Columbus, Ohio

Nationwide Mutual Fire Insurance Company
Columbus, Ohio

Nationwide Mutual Insurance Company
Columbus, Ohio

Newport Insurance Company
Newport Beach, Ca.

Nodak Mutual Insurance Company
Fargo, North Dakota

North American Co. for Prop. & Cas. Ins.
Chicago, Illinois

North American Reinsurance Corp.
New York, New York

North American Lloyds of Texas
Dallas, Texas

North Carolina Farm Bur. Mut. Ins. Co.
Raleigh, North Carolina

North East Insurance Company
Portland, Maine

Northern Ill. Farmers Mutual Insurance Co.
Arlington Heights, Illinois

North Pacific Insurance Company
Portland, Oregon

Northland Insurance Company
St. Paul, Minnesota

Northwest Farm Bureau Insurance Company
Salem, Oregon

North-West Insurance Company
Portland, Oregon

Occidental Fire and Casualty Company
Denver, Colorado

Ohio Farmers Insurance Company
Westfield Center, Ohio

Ohio Hardware Mutual Insurance Company
Mansfield, Ohio

Oklahoma Farm Bur. Mut. Ins. Co.
Oklahoma City, Oklahoma

Oklahoma Surety Company
Tulsa, Oklahoma

Old Reliable Fire Insurance Company
Webster Groves, Missouri

Old Security Casualty Insurance Company
Kansas City, Missouri

Olympic Insurance Company
Los Angeles, California

Omaha Indemnity Company
Omaha, Nebraska

Oregon Automobile Insurance Company
Portland, Oregon

Oregon Mutual Insurance Company
MC Minnville, Oregon

Pan American Fire & Casualty Company
Houston, Texas

Parliament Insurance Company
Northfield, Illinois

Paxton National Insurance Company
Harrisburg, Pennsylvania

Pekin Insurance Company
Pekin, Illinois

Peninsular Fire Insurance Company
Jacksonville, Florida

JC Penney Cas. Ins. Co.
Westerville, Ohio

Personal Service Insurance Company
Columbus, Ohio

Petroleum Casualty Company
Houston, Texas

Prairie States Fire Insurance Company
Sioux Falls, South Dakota

Preferred Risk Mutual Insurance Company
West Des Moines, Iowa

Presidio Insurance Company
Los Angeles, California

Professional Insurance Company
Kansas City, Missouri

Progressive Casualty Insurance Company
Cleveland, Ohio

Proprietors Insurance Company
Deleware, Ohio

Protective Fire & Casualty Company
Lincoln, Nebraska

Protective Insurance Company
Indianapolis, Indiana

Protective National Insurance Company
Omaha, Nebraska

Providence Washington Insurance Company
Providence, Rhode Island

Providence Washington Ins. Co. of Alaska
Providence, Rhode Island

Prudential Assurance Company, Ltd.
Montreal, Quebec, Canada

Puritan Insurance Company
Stamford, Connecticut

Ranger Insurance Company of New York
Houston, Texas

Ranger Lloyds
Houston, Texas

Regent Insurance Company
Madison, Wisconsin

Riverside Insurance Co. of America
Battle Creek, Michigan

RLI Insurance Company
Peoria, Illinois

Rochdale Insurance Company
New York, New York

Rocky Mountain Fire & Casualty Company
Seattle, Washington

Rural Mutual Insurance Company
Madison, Wisconsin

S & H Insurance Company
Los Angeles, California

Save-T-Risk Insurance Company
Columbus, Ohio

Scor Reinsurance Company
Dallas, Texas

Select Risk Mutual Fire Ins. Co.
Huntingdon, Pennsylvania

Shield Insurance Company
Atlanta, Georgia

Skandia America Reinsurance Company
New York, New York

South Carolina Farm Bureau Mut. Ins. Co.
Cayce, South Carolina

Southeast Title & Insurance Company
Lake Park, Florida

Southeastern Fire Insurance Company
Charlotte, North Carolina

Southern Farm Bureau Casualty Ins. Co.
Jackson, Mississippi

Southern Casualty Insurance Company
Alexandria, Louisiana

Southern Guaranty Insurance Company
Montgomery, Alabama

Southern States Insurance Exchange
Richmond, Virginia

Southern Trust Insurance Company
Macon, Georgia

Southwestern Insurance Company
Oklahoma City, Oklahoma

Southwestern National Insurance Company
Oklahoma City, Oklahoma

Standard Fire Insurance Co. of Alabama
Birmingham, Alabama

Standard Guaranty Insurance Company
Atlanta, Georgia

Standard Mutual Insurance Company
Springfield, Illinois

State Automobile & Casualty Underwriters
Des Moines, Iowa

State Automobile Insurance Association
Indianapolis, Indiana

State Automobile Mutual Insurance Co.
Columbus, Ohio

State Surety Company
Des Moines, Iowa

Statesman Insurance Company
Indianapolis, Indiana

St. John's Insurance Company, Ltd.
Hamilton, Bermuda

Stonewall Casualty Company
Fairmont, West Virginia

Stonewall Insurance Company
Birmingham, Alabama

Stuyvesant Insurance Company
Allentown, Pennsylvania

Summit Fidelity and Surety Company
Des Moines, Iowa

Surplus Underwriters Casualty Ins. Co.
New Orleans, La.

Sutter Insurance Company
San Francisco, California

Tennessee Farmers Mutual Insurance Co.
Columbia, Tennessee

Texas Farm Bureau Ins. Co.
Waco, Texas

Texas Farm Bureau Underwriters
Waco, Texas

Texas United Insurance Co.
San Antonio, Texas

Thomas Jefferson Insurance Company
Jacksonville, Florida

Thriftco Insurance Company
Los Angeles, California

Thurston Fire and Casualty Ins. Co.
Tulsa, Oklahoma

Tico Insurance Company
Dallas, Texas

Tower Insurance Company, Inc.
Milwaukee, Wisconsin

Town & Country Fire & Cas. Ins. Co.
Hutchinson, Kansas

Town & Country Insurance Company
Oklahoma City, Oklahoma

Transamerica Ins. Co. of Texas
Los Angeles, California

Transatlantic Reinsurance Company
New York, New York

Transamerica Insurance Company
Los Angeles, California

Transit Casualty Company
Los Angeles, California

Transport Indemnity Company
Los Angeles, California

Transport Insurance Company
Dallas, Texas

Twentieth Century Insurance Company
Los Angeles, California

United America Underwriters
San Diego, California

United Farm Bureau Mutual Insurance Co.
Indianapolis, Indiana

United Fire Insurance Company
Chicago, Illinois

United National Insurance Company
Philadelphia, Pennsylvania

United Services Automobile Association
San Antonio, Texas

United States Liability Ins. Co.
King of Prussia, Pa.

Universal Insurance Company
San Juan, Puerto Rico

Universal Underwriters Insurance Company
Kansas City, Missouri

Universal Underwriters Lloyds
Kansas City, Missouri

USAA Casualty Insurance Company
San Antonio, Texas

USAA General Indemnity Co.
San Antonio, Texas

Utah Farm Bureau Insurance Company
Salt Lake City, Utah

Vernon Fire and Casualty Insurance Co.
Indianapolis, Indiana

Virginia Farm Bur. Mut. Ins. Co.
Richmond, Virginia

Virginia Mutual Insurance Company
Richmond, Virginia

Volkswagen Insurance Company
St. Louis, Missouri

Washington & Jefferson Mutual Ins. Co.
Celina, Ohio

Wesco Insurance Company
Amarillo, Texas

Westfield Insurance Company
Westfield Center, Ohio

Westfield National Insurance Company
Westfield Center, Ohio

Western Agricultural Insurance Co.
Phoenix, Arizona

Western Alliance Insurance Company
Providence, R.I.

Western Employers Insurance Co.
Fullerton, California

Western Farm Bur. Mut. Ins. Co.
Las Cruces, New Mexico

Western Lloyds Insurance Company
Beaumont, Texas

Western States Insurance Company
Freeport, Illinois

Western World Insurance Co., Inc.
Ramsey, New Jersey

Westmoreland Casualty Company
Greenburg, Pennsylvania

Wilshire Insurance Company
Los Angeles, California

Wolverine Insurance Company
Battle Creek, Michigan

Workmen's Auto Insurance Company
Los Angeles, California

Worldwide Underwriters Insurance Company
St. Louis, Missouri

York Insurance Company
Providence, R.I.

Zurich American Ins. Co. of Illinois
Chicago, Illinois

Zurich Insurance Company
Chicago, Illinois